

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

RECEIVED
Nov 6 3 36 PM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997

)
)
)

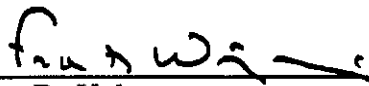
Docket No. R97-1

**SECOND SET OF INTERROGATORIES OF THE ADVERTISING MAIL
MARKETING ASSOCIATION TO USPS WITNESS CRUM
(AMMA/USPS-T-28-6-12)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Advertising Mail Marketing Association hereby propounds the attached interrogatories and requests for the production of documents. The instructions contained in our interrogatories to Witness Moeller (AMMA/USPS-T-36-1-3) are incorporated by reference.

If you are unable to provide any of the requested documents or information as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided. If the witness to whom this request is directed cannot respond, but another witness can, please redirect the request to that witness.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Counsel to Advertising Mail Marketing
Association

RIAA/USPS-T-28-6

The following question refers to Table 1 of LR-H-108, "Controlled to GFY RPW."

- a. Please confirm that the average revenue generated in FY96 by Standard (A) flats is 19.04 cents per piece.
- b. Please confirm that the average revenue generated in FY96 by Standard (A) parcels is 44.18¢ per piece.
- c. If you cannot confirm one or more of parts a or b, please provide the calculations necessary to develop the average revenue per piece.

RIAA/USPS-T-28-7

The following questions refer to Table 7 of LR-H-108.

- a. Please provide the page number(s), line number(s) and column number(s) in LR-H-111 for line "2) Cost Avoidance of the Entry Cost Avoidance." Please provide derivation(s) if the citation(s) is (are) not to the same values as used in Table 7.
- b. Please provide the page number(s), line number(s) and column number(s) in Exhibit USPS-T-29C for line "5) Presort Cost Avoidances." Please provide derivation(s) if the citation(s) is (are) not to the same values used in Table 7.

RIAA/USPS-T-28-8

Please provide detailed citations to the sources of the values in the sheets "Letter", "FLATSCT" and "PCLCST" in the EXCEL spreadsheet titled "Cstbyshp.xls."

RIAA/USPS T-28-9

In Table 3 of LR-H-108, cost category "3.1a Mail Processing Variable w/Pigbk" is sourced to LR-H-106.

- a. Please confirm that the data collection and analysis in LR-H-106 used to develop the costs in line 3.1a of Table 3 provide separate costs for each of the shapes: letters, flats and parcels. If you cannot confirm part a, please explain.
- b. Please confirm that the result of using disaggregate costs in Standard (A) mail show the following:

	Average Costs (cents/piece)		
	Letters	Flats	Parcels
	(1)	(2)	(3)
3.1a Mail Processing Variable w/Pigbk	4.0427	4.9416	28.3512

If you cannot confirm please show and explain the calculation you would perform to get the average cost per piece.

RIAA/USPS-T-28-10

In Table 7 of LR-H-108, line "5) Presort Cost Avoidance" is sourced to Exhibit USPS-T-29C. Please provide exact reference to Exhibit USPS-T-29C for the data used in Table 7.

RIAA/USPS-T-28-11

In Table 3 of LR-H-108 line "14b Highway" and line "14c Railroad", the derivations of these costs of surface transportation by shape are obtained by "C.S. Total dist to shape by cube."

- a. Please confirm that the surface transportation costs in 14b and 14c of Table 3 under the Column heading "Sum of Shapes" are the Cost Segment Totals for these lines. If you cannot confirm, please explain.
- b. Please provide the source for these total costs of surface transportation.
- c. Please confirm that these surface transportation costs in Table 3 are distributed to letters, flats and parcels in proportion to the total cubic feet of letters, flats and parcels, respectively. If you cannot confirm, please explain.

RIAA/USPS-T-28-12


The following questions involve the EXCEL spreadsheet for LH-R-108 titled Estar96.xls.

- a. In the sheet titled "DATA", please provide a "decoder" that fully defines each code used in Columns A through H, inclusive.
- b. In the sheet titled "wtdata", please provide headings for all Columns, a decoder for Columns A, B and C, and a source for the data in Columns D through V inclusive.
- c. In the sheet titled "PISM", please provide headings for all Columns, a decoder for Column A and B, and exact source(s) for Columns C through U, inclusive.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: November 6, 1997



Ian D. Volner